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Low-Risk Deleading Work by Homeowners and Their Agents

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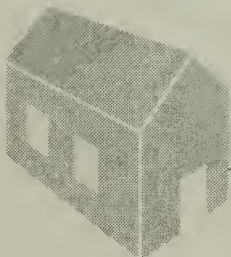


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A Step-by-Step Guide

Massachusetts Department of Public Health
Childhood Lead Poisoning Prevention Program

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The Purpose of This Booklet

This booklet explains low-risk deleading work that homeowners and their agents can do themselves under the Massachusetts Lead Law. The law requires both homeowners and their agents to read this booklet, take the enclosed examination and mail it to the Childhood Lead Poisoning Prevention Program (CLPPP) before beginning any work.

Except for those low-risk tasks specifically listed in this booklet, all deleading work must be performed by a Licensed Deleader.

The Massachusetts Lead Law requires housing units built before 1978 to be delead when any child under the age of six years lives in the unit.

In the past, the Lead Law and regulations required that all deleading work had to be done by Licensed Deleaders because of the dangers involved in the work. However, it is now clear that some deleading work activities are far less dangerous than others. They are called low-risk deleading work.

Beginning in March, 1995, homeowners and their agents can do low-risk deleading work themselves without being Licensed Deleaders, as long as they follow Lead Poisoning Prevention and Control Regulations and the instructions in this booklet for low-risk deleading work.



The Problem of Lead Paint in Housing

Housing units built before 1978 are likely to have lead paint on the inside and on the outside of the structure.

When old lead paint cracks or peels, it can create lead paint chips and lead dust. When children swallow or breathe lead paint chips or lead dust, they become poisoned.

Lead Poisoning can slow a child's development as well as cause learning and behavior problems. Children under the age of six are at the greatest risk.

Older children and adults can also suffer from lead poisoning.

In the past both children and adults have been poisoned by improper renovation and illegal deleading. It is important to be safe when working with lead-painted surfaces.

What Is Low-Risk Deleading Work?

Low-Risk deleading work means doing only the following activities:

- removing doors, cabinet doors, shutters
- covering surfaces
- encapsulating surfaces
- capping baseboards

Encapsulating means applying a special liquid coating, called an encapsulant, over lead paint so that the coating forms an effective, long-lasting barrier. Paint is not an encapsulant. Only encapsulants on the Massachusetts Register of Approved Encapsulants may be used.

Homeowners and their agents who wish to encapsulate surfaces must first obtain a free copy of CLPPP's Encapsulation Training Video, watch it, take the accompanying exam, and then mail the exam to CLPPP before beginning work. Contact CLPPP, any Department of Public Health Regional Office, or your local lead poisoning prevention program for a copy of the video.

Who Can Do Low-Risk Work?

Homeowners and their agents do not need to be Licensed Deleaders to do low-risk deleading work. They must follow the steps detailed in this booklet.

An agent is any person who does work for a homeowner. An agent can be an employee of a homeowner, a contractor or contracting company hired to do specific work, a family member or a friend. **An agent must be 18 years or older.**

Low-risk Work Homeowners and Their Agents Can Do Themselves

Area Needing Deleading

Low-Risk Deleading Methods

Doors (but no woodwork)
Cabinet doors
Shutters

Remove and/or replace

Stair treads
Stair risers

Cover with carpeting, vinyl or rubber mats

Window wells

Cover with aluminum

Interior walls

Cover with Plexiglas, vinyl-backed wallpaper, Formica, gypsum board, wood, tile, or fiberglass

Baseboards

Cap with quarter-round wood molding; cover outside corners with wood

Interior casings

Cover with wood

Parting beads

Cover with vinyl or aluminum

Exterior building sides

Cover with insulating house wrap, vinyl siding

Exterior window sills, door casings

Cover with vinyl or aluminum

Surfaces identified by Inspector as eligible for encapsulation

Encapsulate

Steps Homeowners and Their Agents Must Follow

Removing Doors and Shutters

To take down doors, cabinet doors and shutters, remove hinge pins or hinges. Take doors, cabinet doors and shutters to an off-site dip-tank or replace with new doors, cabinet doors, shutters.

Covering Surfaces

Apply and secure appropriate coverings. Avoid creating debris. Avoid hammering flaking surfaces so chips fall to floor. Wipe any flaking or dusty surface with damp, disposable cloth before beginning to apply covering.

Covering Interior Surfaces

Stair treads, stair risers and window wells must be intact or made intact by a Deleader before work begins because they are friction and impact surfaces. Walls and interior casings do not need to be intact before work begins because they are non-friction and non-impact surfaces.

Covering Exterior Surfaces

Exterior building sides do not need to be intact. If not intact, the side must be covered with insulating house wrap before work begins. Homeowners and their agents may apply insulating house wrap. If sides are to be made intact rather than covered with insulating house wrap, a Deleader must make sides intact before homeowners or their agents apply vinyl siding.

Encapsulation

Test surfaces identified as eligible for encapsulation, using approved tape and patch tests. Apply encapsulant to intact surfaces, or surfaces made intact by a Licensed Deleader, which pass tape and patch tests. Clean up all spills and oversprays after encapsulant has been applied.

Special Concerns about Low-Risk Deleading Work

Use Careful Judgment

- Do not enter the work area when a Deleader is working
- Do not allow occupants to be present when doing low-risk work on non-intact surfaces
- Costs may increase if homeowners or their agents do work so poorly that it must be redone
- A Licensed Deleader must make lead-painted surfaces intact when required by regulation

Avoid Dangerous Debris

- Low-Risk work can disturb lead paint or create dangerous lead debris if done carelessly
- Hammering surfaces with flaking lead paint may produce dangerous debris
- When installing paneling and other coverings on walls with flaking lead paint, consider using screws, glue or sealant rather than nails in order to create as little debris as possible
- Wipe down a flaking wall surface with a damp, disposable cloth before beginning to attach any covering: fold debris inside cloth and dispose of cloth
- Wear gloves when working on non-intact surfaces to keep debris off your skin
- Use thick plastic (4-6 mils thick) in the work area: dry cleaning bags, thin garbage bags, or plastic shopping bags are too thin to provide adequate protection from debris

Work Homeowners and Their Agents Cannot Do

- Remove windows and other building parts
- Scrape surfaces
- Sand surfaces
- Make surfaces intact
- Use chemicals to remove lead paint

Inspection for Reoccupancy

- During the Reoccupancy Inspection, the Inspector will take dust wipe samples to see if there is a dangerous level of lead dust in the dwelling
- When work is done carelessly and dangerous lead dust is created, the dwelling may fail the dust wipe testing done at the Reoccupancy Inspection
- If the dust wipes reveal dangerous lead dust levels, the area must be recleaned by the Deleader and retested before Reoccupancy will be granted

When Can Homeowners and Their Agents Do Low-Risk Deleading Work?

Remember to do low-risk work at the right time!

- Do not plan work before the Inspection
- Do not plan work before talking to the Inspector and Deleader
- Do not do low-risk deleading work before reading this booklet
- Do not apply encapsulants before watching the Encapsulant Video
- Do low-risk deleading work **before** a Deleader begins work, **after** a Deleader has stopped working and cleaned up, or **after** the Reoccupancy Inspection
- Any doors removed must be replaced **before** Reoccupancy
- Encapsulants must be applied **after** Reoccupancy
- All work done when occupants are present can only be done on **intact** surfaces

Except for those low-risk tasks listed in this booklet, all deleading work must be performed by a Licensed Deleader.

Required Training

The Massachusetts Lead Law requires that homeowners and their agents who do low-risk deleading work read this booklet, complete the following exam, and mail it to CLPPP (305 South Street, Jamaica Plain, MA 02130) before starting any work.

Send one exam for each person doing low-risk work. Copy unmarked exam for multiple copies.

Please check correct boxes:

- ☐ I have read this booklet
- ☐ I am the Homeowner
- ☐ I am the Agent (18 or older)

Name _____

Address _____

Signature _____ Date _____

True or False?

- Low-Risk deleading work can be done by persons under 18 years of age.
☐ True ☐ False
- If exterior building sides are flaking, a homeowner or agent must cover the sides with insulating house wrap before installing vinyl siding.
☐ True ☐ False
- Debris from low-risk work should be double bagged before disposal.
☐ True ☐ False

4. It is not necessary to shut windows and doors before beginning low-risk deleading work.
☐ True ☐ False
5. Wallpaper without a vinyl back and fabric are good and legal ways to cover walls with lead paint.
☐ True ☐ False
6. All low-risk work done after occupants have moved back into dwelling must be done on intact surfaces.
☐ True ☐ False

Circle Best Answer

7. Homeowners and agents cannot do what type of work?
- a. Covering stair treads, risers, and window wells
 - b. Scraping, sanding, patching surfaces and removing windows
 - c. Capping baseboards, covering interior walls
 - d. Covering exterior building sides
8. When can you put paneling on a wall with loose and peeling paint?
- a. After Deleader work and cleanup but before Reoccupancy Inspection
 - b. Before Deleader begins work
 - c. On the weekend
 - d. After Reoccupancy Inspection
9. When must removed doors be replaced?
- a. After Reoccupancy
 - b. During Deleader's work
 - c. At any time
 - d. Before Reoccupancy

10. What safety precautions must you take when doing low-risk deleading work outside?
- a. Moving play equipment and sandboxes
 - b. Covering soil and plants next to work area with thick plastic
 - c. Shutting windows and storm windows to keep debris from inside the building
 - d. All of the above
11. What is the best way to clean up a work area?
- a. Washing with dish soap
 - b. Vacuuming with the family vacuum
 - c. Washing with TSP and drying with paper towels
 - d. Sweeping the area several times
12. Low-Risk work must pass what test before Reoccupancy is allowed?
- a. The dust wipe test
 - b. The TSP test
 - c. The cleanup test
 - d. The vacuum test

Answers: 1. False; 2. True; 3. True; 4. False; 5. False;
6. True; 7. b; 8. a; 9. d; 10. d; 11. c; 12. a

For More Information Contact

Childhood Lead Poisoning
Prevention Program (CLPPP)
305 South Street
Jamaica Plain MA 02130
1-800-532-9571 or 617-522-3700 x188

To receive these materials, mail this list to CLPPP with your requests checked:

- ☐ The Risks of Renovation
- ☐ Lead Poisoning: Facts and Guidelines
- ☐ A Cleaning Guide for Temporarily Reducing Lead Hazards
- ☐ Deleading? Grants & Loans for Property Owners 1995 Resource Directory
- ☐ Deciding Whether to Encapsulate
- ☐ Care and Maintenance of Encapsulated Surfaces
- ☐ Encapsulants: Guidelines for Tenants and Property Owners
- ☐ Register of Approved Encapsulant Products
- ☐ Encapsulant Product Fact Sheets
- ☐ Encapsulation Training Video
- ☐ Massachusetts Lead Law (M.G.L. c. 111 §§ 189A-199B)
- ☐ Lead Poisoning Prevention and Control Regulations (105 CMR 460.000)
- ☐ List of Licensed Deleaders
- ☐ List of Licensed Lead Inspectors (Eastern MA)
- ☐ List of Licensed Lead Inspectors (Western MA)

Name

Address

Timetable for Low-risk Work

| Before Deleader Work | During Deleader Work | After Deleader Cleanup but before Reoccupancy Inspection | After Reoccupancy Inspection and Occupant Return but before Compliance |
|---|---|---|--|
| Complete tape and patch tests for encapsulation on surfaces identified by Inspector as eligible for encapsulation | HOMEOWNERS AND THEIR AGENTS MAY NOT DO ANY WORK DURING THIS PERIOD | | Degloss and clean intact surfaces, apply and clean up encapsulant |
| Remove and/or replace doors, cabinet doors, shutters | | Replace doors, cabinet doors, shutters | Replace cabinet doors, shutters |
| Apply exterior vinyl siding to intact building sides or to building sides first covered with insulating house wrap (Exterior window wells and trim, door casings and jambs need not be intact or covered with house wrap) | | See "Before Deleader Work" at left | See "Before Deleader Work" at left |
| Cover surfaces already intact | | Cover non-intact interior surfaces | Cover surfaces made intact by Deleader |
| Cap baseboards | | Cap baseboards | Cap baseboards |

Please Remember...

Low-Risk work means that it is safe to do this work without being highly trained and licensed in special deleading techniques. However, it is possible to create dangerous lead debris while doing low-risk work. Therefore, homeowners and their agents must follow common sense safety practices as well as the few safety procedures detailed in this booklet.

Protect the Health of Others

Keeep everyone (especially children and pregnant women) **out of the work area** except homeowners and their agents.

- The work area means the entire room in which low-risk work takes place
- The work area includes up to ten feet on either side of an interior common area or an exterior area
- When a door is removed or covered, the work area means the adjacent room or hallway on both sides of the door
- When a common hallway is delead, the work area means all space on the same floor in the hallway or up to ten feet in either direction

Protect Your Own Health

- Avoid getting lead debris in your mouth, eyes or lungs
- Never touch face, nose or mouth when working
- Never eat, smoke, drink, chew gum or tobacco when working
- Wash hands thoroughly with soap and water at the end of each work period; shower, wash hair, and clothes at the end of the work day (keep clothes separate from other wash to keep from spreading lead debris)
- When working, wear gloves to protect hands and safety goggles to protect eyes

When Working Inside

- Shut windows and doors to keep lead debris in the work area
- Cover vents and registers with thick plastic and seal with duct tape
- Cover floor with thick plastic before beginning:
 - cover enough floor area to catch debris from work area
 - cover floor on both sides of doors being removed
- Before applying encapsulants with airless sprayer, seal off entire room, including floor, with thick plastic and duct tape
- If possible, move furniture and belongings outside the work area, or cover with thick plastic and seal with duct tape to prevent debris from getting on belongings
- Remove all food from the work area (unless it is inside a refrigerator or cupboard with doors taped shut)
- After removal, wrap doors and cabinet doors in thick plastic and seal with duct tape before taking them outside the work area (use plastic on floor under the door and cabinet doors)

When Working Outside

- On the building side where you are working, shut windows (including storms) and doors to keep lead debris from entering the building: using thick plastic, seal windows without storms from the inside
- Protect soil, plants and sandboxes by covering with disposable tarps or thick plastic
- Attach tarps or plastic to building foundation with duct tape (or nails or staples) and secure outside edges with bricks, rocks or boards
- Protect outdoor furniture and belongings by removing them from the work area and/or by covering them with thick plastic sealed with duct tape
- Move sandboxes and play equipment away from the work area
- Wrap removed shutters in thick plastic sealed with duct tape before taking them outside the work area
- Do not work on days with winds strong enough to blow chips and debris off plastic

Safe Cleanup and Disposal Practices

Interior Cleanup

- Remove all plastic without spilling debris:
 - carefully fold plastic so that debris is folded inside the plastic
 - seal folded plastic with tape
- Clean up after low-risk deleading work:
 - wet sponge or mop all surfaces exposed to debris with a high-phosphate detergent like tri-sodium phosphate (TSP) or a lead-specific detergent
 - use disposable sponges, mop heads and towels
 - rinse with clear, warm water and wipe dry with paper towels
- Do not use a broom, whisk broom or household vacuum to clean the debris

Exterior Cleanup

- Remove all plastic and tarps without spilling debris:
 - carefully fold so that debris is folded inside the plastic
 - seal folded plastic and tarps with tape
- Clean up after low-risk deleading work:
 - wet sponge or mop all surfaces exposed to debris with a high-phosphate detergent like tri-sodium phosphate (TSP) or a lead-specific detergent
 - use disposable sponges, mop heads and towels
 - rinse with clear, warm water and wipe dry with paper towels
- Do not use a broom, whisk broom or household vacuum to clean debris
- Rake up any paint chips that may have landed on the ground

Disposal

- Double bag all items to be disposed of by placing them inside a plastic bag and placing that plastic bag inside another plastic bag before putting bags in trash

What Happens When Low-Risk Work Is Completed?

At the Reoccupancy Inspection, the Inspector checks to see if a dwelling is safe to live in. The Reoccupancy Inspection always takes place after the Deleader has finished all work and cleanup.

The Inspector checks several things (in addition to the quality of the Deleader's work and cleanup):

- All doors must be replaced
- No debris can be left behind
- All surfaces must be intact
- All low-risk work completed to this point must be done properly

The Inspector also takes dust wipe samples of several surfaces to test for lead dust. A dwelling must pass the dust wipe testing before Reoccupancy can be allowed.

Once the occupants move back into the dwelling, homeowners and their agents may still do some low-risk work:

- Apply encapsulants
- Cover intact surfaces
- Replace cabinet doors and shutters
- Cap baseboards
- Apply insulating house wrap and vinyl siding

The Inspector will return to inspect for final compliance. At that time, homeowners and their agents who do low-risk work must indicate work done and sign a statement that all low-risk work was done according to the Lead Law and regulations, and guidelines in this booklet.

Checklist

- ☐ Have inspection
- ☐ Discuss deleading work with Inspector and Deleader
- ☐ Decide to do low-risk work
- ☐ Read this booklet
- ☐ Take exam and mail to CLPPP
- ☐ Have agents take exam and mail to CLPPP
- ☐ Obtain and watch Encapsulation Video if planning to use encapsulants, take accompanying exam, and mail to CLPPP
- ☐ Assemble supplies and materials
- ☐ Assemble safety equipment
- ☐ Do work
- ☐ Clean up and dispose of debris
- ☐ Leave and allow Deleader to work
- ☐ Deleader performs cleanup and disposal
- ☐ Do more work
- ☐ Clean up and dispose of debris
- ☐ Reoccupancy Inspection
- ☐ Do more work
- ☐ Clean up and dispose of debris
- ☐ Homeowner/Agent Deleading Reinspection



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